

**IN THE ENVIRONMENT COURT
AT WELLINGTON
TE KŌTI TAIAO O AOTEAROA**

ENV-2024-WLG-000047

IN THE MATTER An appeal under Schedule 1 of the Resource Management Act 1991 to Greater Wellington Regional Councils Regional Policy Statement Change 1.

BETWEEN **KAPITI COAST DISTRICT COUNCIL**

Appellant

AND **GREATER WELLINGTON REGIONAL COUNCIL**

Respondent

**AMENDED NOTICE OF INTENTION TO BE A PARTY TO PROCEEDINGS
UNDER SECTION 274 ON BEHALF OF WAIKANAE NORTH
DEVELOPMENTS LIMITED**

11 February 2025

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To The Registrar
Environment Court
Wellington

**AMENDED NOTICE OF INTENTION TO BE A PARTY TO
PROCEEDINGS UNDER SECTION 274**

1. Waikanae North Developments Limited (**WNDL**) has given notice that it wishes to be a party to the following proceeding:
 - a) Kapiti Coast District Council's (**KCDC**) appeal against the decision of the Wellington Regional Council on proposed Plan Change 1 to the Wellington Regional Policy Statement.
2. WNDL made a submission and further submission on Change 1.
3. WNDL has an interest in the proceedings that is greater than the interest that the general public has. WNDL is a land developer and owns a large greenfields site at Waikanae. The WNDL site has been identified as a high priority development and is a listed project under the Fast Track Approvals Bill. It is a regionally significant land development project. The WNDL site is affected by the provisions of proposed Plan Change 1.
4. WNDL is not a trade competitor for the purposes of section 308 of the Resource Management Act 1991.
5. WNL D is directly affected by an effect of the subject of the appeal that:
 - (a) Adversely affects the environment; and
 - (b) Does not relate to trade competition or the effects of trade competition.
6. WNDL is interested in parts of the proceeding. The parts of the proceedings WNDL is interested in are:

- (a) Objective 22
 - (b) Policy 57
 - (c) Policies CC.1, CC.2, CC.2A and CC.11
7. WNDL is interested in aspects of the proceeding that could result in changes to the RPS- PC1 that assist to ensure that PC-1 (and the RPS):
- (a) properly recognises the importance and benefits of appropriately located and well-designed greenfield housing developments to achieve well-functioning urban development and rural areas;
 - (b) provides policy support for greenfield housing development that contributed to well-functioning urban development and rural areas in the region;
 - (c) ensures that land that is suitable for greenfield housing development is not sterilised as a result of the Policy framework implemented through RPS-PC-1;
 - (d) introduces policy that gives effect to NPS-FM and NPS-UD in a more balanced way than the notified version, by ensuring that it gives appropriate recognition to the use as well as to the protection elements of National Directions;
 - (e) does not overreach by attempting to manage the effects of climate through planning instruments in a manner that fails to adequately recognise and provide for the benefits of greenfield housing and other development and which does not properly recognise the relative efficiency of other policy, statutory and economic levers to manage greenhouse gas emissions, rather than attempting to manage these effects indirectly and inefficiently by restricting greenfield housing opportunities and other activities; and

- (f) does not include unduly restrictive references to compact urban form that would limit greenfield development, including integrating land use and transportation; and
 - (g) avoids unnecessary duplication or repetition.
8. WNDL **supports** the requested relief sought by KCDC's appeal, to the extent it is consistent with the relief sought by WNDL, in relation to the following specific provisions:
- (a) Amendments to Policy 57 to ensure workability and clarity;
 - (b) Amendments to policy CC.1 to ensure it is clear and consistent with the responsibilities of the territorial authority;
 - (c) Deletion of Policy CC.2 or amendment to allow for non-regulatory methods to promote changes in travel mode choices and remove timeframe implementation;
 - (d) Deletion of Policy CC.2A
 - (e) Deletion of Policy CC.11 or amendment to only apply to regional plans.
9. WNL D **opposes** the requested relief sought by KCDC's appeal, to the extent it is inconsistent with or would not achieve the relief sought by WNDL in relation to the following specific provision:
- (a) Amendments to Objective 22 to remove the level of detail – this detail is considered appropriate and helpful for consideration of future subdivision, use and development projects.
10. WNDL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 11 February 2025.



A Beatson

For Waikanae North Developments Limited

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